

CAH/2018R00583

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 19- 467
:
v. :
:
DUANE ROBINSON : 18 U.S.C. § 656

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
 - a. JPMorgan Chase Bank, NA had a branch office located in Orange, New Jersey (the "Bank").
 - b. Defendant DUANE ROBINSON was employed as a teller of the Bank.
 - c. The deposits of the Bank were insured by the Federal Deposit Insurance Corporation.
2. From in or about January 2016 to in or about May 2018, defendant DUANE ROBINSON was the sole custodian for two Electronic Automated Teller Machines ("EATMs") at the Bank. As sole custodian, defendant DUANE ROBINSON was responsible for maintaining the EATMs, including loading the EATMs with cash.
3. While he was sole custodian of the EATMs, defendant DUANE ROBINSON embezzled moneys and funds of the Bank by taking hundreds of thousands of dollars in cash from the EATMs that he maintained.

4. Defendant DUANE ROBINSON embezzled at least approximately \$350,000 in moneys and funds of the Bank, which he converted to his own use and benefit.

5. From in or about January 2016 through in or about May 2018, in Essex County, in the District of New Jersey and elsewhere, defendant

DUANE ROBINSON,

being an employee of the Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, did knowingly embezzle, abstract, purloin, and willfully misapply more than \$1,000 in moneys and funds of the Bank, with the intent to injure and defraud the Bank.

In violation of Title 18, United States Code, Section 656.

FORFEITURE ALLEGATION

1. The United States hereby gives notice to defendant

DUANE ROBINSON

that, upon conviction of the offense charged in this Information, the government will seek forfeiture from the defendant in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of the offense charged in this Information to forfeit any and all property constituting or derived from proceeds obtained directly or indirectly as a result of such offense, including but not limited to, a sum of money equal to at least \$350,000.00 in United States currency, which will be finalized at sentencing.

2. If any of the above described forfeitable property, as a result of any act or omission of defendant DUANE ROBINSON:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section

2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in paragraph 1.



CRAIG CARPENITO
United States Attorney

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**INFORMATION
FOR**

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